



April 10, 2013

Jim Woody
President

Kelly Worthington
Executive Vice President

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WC Docket No. 10-90 and WC Docket No. 05-337

Dear Ms. Dortch:

On April 9, 2013, Herman Roark and Curtis Hunt of Border to Border Communications, Inc. ("Border to Border"), and Gerry Duffy representing the Western Telecommunications Alliance met with Commissioner Mignon Clyburn and Angela Kronenberg, Wireline Legal Advisor to Commissioner Clyburn, regarding Border to Border's pending petition for waiver of the \$250 per loop per month cap and quantile regression benchmark limitations of the high-cost support for its Texas study area.

Border to Border urged prompt action upon its waiver petition, which has been pending since July 2012. It is currently working on responses to written inquiries from the Commission's staff, which were received on or about March 8, 2013.

Border to Border is a very small company that serves hitherto unserved and sparsely populated areas along the United States-Mexico border in the Texas counties of Zapata and Webb. It primarily serves ranch employees in areas plagued by drug activity and illegal crossings where 911 service is essential for life and public safety.

Reductions in its high cost support have forced Border to Border to discontinue plant investments and service upgrades that were scheduled for 2012 and beyond. At this time, the Rural Utilities Service ("RUS") has suspended Border to Border's ability to make additional draws on existing loans. For example, Border to Border is currently unable to replace a 300 foot tower knocked down by a severe wind shear, which is common to its service area, or to fulfill wireless company orders for additional T-1 backhaul facilities. Barring grant of its requested waiver at an early date, Border to Border is likely to run out of cash and default on its RUS loan during 2014.

Border to Border notes that it has expended approximately \$100,000 to date for the preparation and prosecution of its waiver petition.

Respectfully submitted,

/s/

Gerard J. Duffy
Regulatory Counsel

cc: Commissioner Mignon Clyburn
Angela Kronenberg